

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

In re:)	Case No. 08-45591-399
)	Chapter 7
TED R. PALMER, and)	
ETOY H. PALMER,)	Hearing Date: September 21, 2010
)	Hearing Time: 9:30 a.m.
Debtors.)	Hearing Location: Courtroom 5 North
)	Response due: September 14, 2010
)	
)	Jennifer Alter, #58814, #536692
)	The Law Office of Tracy A. Brown, PC
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**APPLICATION TO SELL MINERALS AND WORKING INTERESTS IN OIL
WELLS PURSUANT TO 11 U.S.C. 363(b)(1) and (F)**

COMES NOW Tracy A. Brown (“Trustee”), by and through her undersigned counsel, and for her Application to Sell Minerals and Working Interests in Oil Wells Pursuant to 11 U.S.C. §363(b)(1) and (f), states to the Court as follows:

1. Tracy A. Brown is the duly appointed and acting Chapter 7 Trustee in the above-captioned case.
2. The Trustee brings this Motion pursuant to 11 U.S.C. §363(b)(1) and (f).
3. This Court has jurisdiction over this matter pursuant to 28 U.S.C. §157(b)(2)(N) and §1334. Venue is proper pursuant to 28 U.S.C. §1409.
4. Among the assets in the Debtors’ Estate are minerals and working interests in oil wells located in the State of Oklahoma, including, but not limited to, the properties located in Carter, Stephens and Garvin Counties, Oklahoma. (hereinafter identified as “Oil Wells”).

5. The Trustee shall sell to LHB VENTURES, LLC and LHB DRILLING, LLC (or its assigns), the bankruptcy estate's interest in the Debtors' various interests in rights to each and every mineral, mineral interest, royalty interest, non-participating royalty interest, gas and mineral lease, working interest, and every interest of every description whatsoever in leased, unleased, producing, non-producing, produced, and stored, severed and unsevered interests in oil, gas and other minerals of every conceivable type and description, including any rights of way, easements, or other surface interest, if any, as may be owned by the within referenced Debtors' bankruptcy estate legally or equitably, pre-petition, if any, for any and all property situated in the State of Oklahoma, including, but not limited to, the properties located in Carter, Stephens and Garvin Counties, Oklahoma. LHB Drilling, LLC (or its assigns), will be the sole purchaser of the estate's working interests, at the price of \$1,000. LHB Ventures, LLC, will be the sole purchaser of the balance of the estate's minerals and other interests at the price of \$15,002.11. A copy of said offer, dated August 4, 2010, is attached hereto and incorporated herein by reference as Exhibit A. LHB Drilling, LLC and LHB Ventures, LLC are disinterested third parties with no connections to the Estate.

6. Sale of the Minerals and Working Interests by the Trustee is in the best interest of the Estate and its creditors, will result in a distribution to unsecured creditors and does not harm or prejudice any party.

7. Any objections to the Trustee's sale of the Minerals and Working Interests as set forth in this Application must be filed in writing with the Court prior to the hearing date and a copy of said objection must be served upon counsel for the Trustee.

8. WHEREFORE, the Trustee prays this Court make and enter its Order granting the Trustee's Application to Sell Minerals and Working Interests in Oil Wells, approving the LHB Ventures, LLC/LHB Drilling, LLC offer, authorizing the Trustee to issue a check for all royalties received after August 4, 2010, and for such other and further relief as this Court may deem just and proper.

The Law Office of Tracy A. Brown, P. C.

By: /s/ Jennifer Alter
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing was served either through the Court's ECF system or by regular mail this 18th day of August, 2010, on the following:

Ted Palmer
Etoy Palmer
Debtors
10602 Saratoga Circle
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LHB Drilling, LLC
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/s/ Debbie Gibson
Debbie Gibson